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City of Sausalito

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7 UNITED STATES COURT

8 DISTRICT OF NORTHERN CALIFORNIA

9 RYAN TUTTLE,

10 Case No.: 3:22-cv-02441-EMC(RMI)

11 Plaintiff,

12 vs.

13 CHRISTOPHER ZAPATA ET AL

14 Defendant

15 PROPOSED AMICUS BRIEF

16 APPLICATION OF AMICI CURIAE IN SUPPORT
17 OF RYAN TUTTLES MOTION FOR
18 TEMPORARY RESTRAINING ORDER

19 [FILED CONCURRENTLY WITH PROPOSED
20 AMICUS BRIEF]

21 I, Robbie Powelson, declare as follows

22 I am president of the Marin County Homeless Union the organizational plaintiff in the lawsuit. I have
23 thorough knowledge of Camp Cormorant at Marinship Park.

24 I have full knowledge of what is in this declaration and if called to testify could and would do so
25 competently.

26 I have direct knowledge the Lieutenant Gregories declaration is impertinent for the foregoing reasons.

27
28 APPLICATION OF AMICI CURIAE IN SUPPORT OF RYAN TUTTLES MOTION FOR TEMPORARY
RESTRANING ORDER[FILED CONCURRENTLY WITH PROPOSED AMICUS BRIEF] - 2

1 I know that Stacey Gregory is rarely at Camp Cormorant and only stops by once in a while, and it is usually
2 during police raids when she is preoccupied taking peoples tents, platforms, cars, etcetera.

3 I have seen half a dozen people turned away for getting a spot at the camp by Urban Alchemy who always
4 tell people they deny to contact Stacey Gregory. When I follow up with people after they try to call her, those
5 people generally tell me that she never returns their calls.

6 It is not feasible for Ryan Tuttle, or anyone for that matter, to call and stay in touch with Lieutenant
7 Gregorie when they themselves do not have a phone and when Lieutenant Gregorie tends to ignores us.

8 I myself have attempted to contact Stacy Gregory to report a crime I was a victim of, and sent written
9 notices and called after a Officer Edgar Padilla directed to me. Even when I talked with her in person, and she
10 persistently ignores me – even when I talked to her in person, she will literally just stare directly at me with her brow
11 furled, say nothing, and ignore my questions.

12 Based on my direct knowledge talking with people seeking to contact Stacey Gregorie that is her pattern
13 and practice to ignore people requesting tents, after Urban Alchemy to direct people to contact her.

14 Based on that knowledge, her declaration is impertinent, because it tactically misrepresents her relationship
15 with campers because she intentionally ignores people and does not talk to them.

16 Because she has an unofficial policy of ignoring people at the camp. She has an open and obvious contempt
17 for almost everyone there (though she has a few favorites). Her antagonistic demeanor against unhoused people
18 generally does not further any compelling governmental interest.

19 When the City crushed our camp at Dunphy Park, I witness Gregorie in her plain clothes that suggested that
20 she was off the clock, driving a massive plow to destroy our possessions after we had been herded like cattle to the
21 sewage contaminated soil at Marinship. She was apparently gleeful of the destruction of peoples property that she
22 came after work to participate in the destruction of property in on her off time.

23 It has been my observation that the police departments practice ignoring people has created apathy amongst
24 unhoused people in Sausalito who simply do not ask for anything from the police department because it is generally
25 understood the police department will not help and that it will increase your risk of retaliation by the police which
26 may result in false arrest, having your vehicle seized, being beaten, rocks thrown at you, or choked by Sausalito
27 Police Department employees.

1 I declare under penalty of perjury the foregoing to be a true and correct statement.
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Robert P. 4/28/22